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COUNSEL/PARTIES OF RECORD	
JUN 18 2019	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF NEVADA

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13 NICHOLAS T. SCHRAM, a Nevada resident, Case No. 3:18-CV-00055-CBC
14 SANDRA L. SCHRAM, a Nevada resident

15 Plaintiffs,

16 vs.

17 MELISSA L. BROWN, a New York resident,
18 Defendant.

ORDER

**STIPULATION
TO EXTEND TIME TO FILE
DISPOSITIVE MOTIONS**

(First Request)

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21 _____ /
22 IT IS HEREBY STIPULATED by and between plaintiffs Nicholas and Sandra
23 Schram, and defendant Melissa L. Brown, by and through their respective counsel,
24 pursuant to LR IA 6-1, that the deadline to file dispositive motions in this case be
25 extended from June 14, 2019 to Monday, July 1, 2019. The reasons for this mutual
26 request for a short extension are as follows:

27 1. On March 28, 2019, this Court approved a "Stipulation and Order to
28 Extend Discovery Deadline" which extended the deadline for the parties to conduct

1 discovery to May 17, 2019 as well as the deadline to file dispositive motions (to June
2 14, 2019). ECF No. 32.

3 2. The Parties utilized the previously-granted extension to, amongst other
4 discovery, conduct depositions of the Plaintiffs, Mr. and Mrs. Schram (the Plaintiffs in
5 this action, hereafter referred to collectively as the "Schrams"), as well as Melissa. The
6 Schrams' depositions took place on May 15, 2019 and Melissa's deposition, which was
7 conducted on May 3, 2019 in New York, N.Y. and simulcast to Reno, N.V. so that
8 counsel for the Schrams and for Melissa did not have to travel to New York.

9 3. Melissa's counsel is informed, based upon his recent discussion with
10 counsel for the Schrams, that the Schrams have just recently finished reviewing their
11 deposition transcripts and have sent their Errata Sheets to the court reporter.
12 Additionally, counsel for the Schrams will be providing a copy of the errata to counsel
13 for Melissa next week.

14 4. With regard to Melissa's deposition transcript, counsel for the Schrams
15 has indicated that he has just been provided a copy and will provide it to counsel for
16 Melissa next week (with a copy of the errata referenced above). Melissa shall review
17 her transcript as soon as she is provided it and provide a copy of any proposed
18 revisions thereto in her errata, which shall be provided to the court reporter with a copy
19 to counsel for the Schrams.

20 5. In order to minimize the need to adjust any references to the
21 aforementioned deposition transcripts of the Schrams and Melissa so that they may be
22 used in any dispositive motions brought by the Parties, a short extension is requested.

23 6. Undersigned Counsel believe that an extension to July 1, 2019 is
24 sufficient to obtain finalized transcripts for the three (3) depositions referenced above
25 and for the Parties to file any dispositive motions if they so choose.

26 7. It is not believed that this extension, if granted, would substantively affect
27 any other deadlines in this case. The Parties' Joint Pre-Trial Order, per the above-
28 referenced Stipulation Extending Discovery Deadlines (ECF No. 32), is due either on

1 July 19, 2019 or "30-days after decision on a dispositive motion." In the event neither
2 party brings a dispositive motion on or before the requested July 1, 2019 deadline, the
3 Parties would comply with the July 19, 2019 deadline for filing the Joint Pre-Trial Order.
4 Should either or both Parties bring a dispositive motion on or before the requested
5 extension, than the Parties would await ruling and file the Joint Pre-Trial Order within
6 30-days as previously ordered.

7 It is respectfully requested that the Court approve this request to extend the
8 dispositive motion deadline to July 1, 2019.

9 DATED: June 14, 2019

10 FOR PLAINTIFFS:

FOR DEFENDANT:

11
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17 IT IS SO ORDERED.

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19 DATED: June 18, 2019

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21 
22 CARLA BALDWIN CARRY
23 U.S. MAGISTRATE JUDGE
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